

**REMARKS**

Claims 8, 10, 11, 13, 15, 17-19 and 21-32 are pending in this application. By this Amendment, claims 8, 10, 11, 13, 15, 17, 19, 21, 22, 24, 25 and 27 are amended and claims 9 and 20 are canceled. Claims 28-32 are added. Support for amended claims 8, 15 and 22 can be found, for example, in paragraph [0095] of U.S. Patent Publication 2002/0093575 A1, a publication of the present application, and step S635 of Fig. 14. Support for amended claim 13 can be found, for example, in paragraphs [0054] and [0111]. Support for new claim 28 can be found, for example, in paragraph [0104] and step S894 of Fig. 16. Support for new claims 30 and 31 can be found, for example, in paragraph [0096] and Fig. 15. Support for new claim 32 can be found, for example, in paragraph [0110]. Thus, no new matter is added. In view of at least the following remarks, reconsideration and allowance are respectfully requested.

**I. Rejection under 35 U.S.C. §102(e)**

Claims 8, 10, 15, 18, 21-23 and 26 are rejected under 35 U.S.C. §102(e) over Ishiguro et al. (U.S. Patent No. 7,062,230). This rejection is respectfully traversed.

Ishiguro fails to disclose all of the features recited in independent claims 8, 15 and 22. In particular, Ishiguro fails to disclose an image-capturing device wherein "the image storage control unit controls the internal memory to store at least one of image identification information with regard to the image data transferred to the detachable portable memory and memory identification information to identify the detachable portable memory."

Ishiguro discloses a composite device (100) comprising an image pickup unit (110) and a main control unit (160) having main CPU (161), a flash memory (162) for storing pickup images or transmission destination addresses, and a buffer memory (163). Ishiguro discloses that the composite device (100) allows a user to capture an image and then transfer the image to a server. See, for example, col. 6, lines 37-41. More specifically, when the

shutter (512) in the switch group (132) is depressed by a user, a pickup image signal of the CCD (112) in the image pickup unit (110) is transmitted to the image processing unit (120). The pickup image signal is then stored and processed. If the composite device (100) is set to a direct transmission mode, a call is generated to a public network. If the call reception and negotiation proceed normally, and the communication between the composite device (100) and the transmission destination server is established, the main CPU (161) in the main control unit (160) transfers the pickup image data within the flash memory (162) once to the buffer memory (163). The main CPU (161) then decomposes the pickup image data within the buffer memory (163) into packets according to a protocol such as TCP/IP, and supplies those packet data to the communication unit (150). The packet data is then converted from the main control unit (160) in accordance with the procedure determined by the type of a composite device (100), and stores the packet data after this conversion in the communication buffer memory (152). The packet data within the communication buffer memory (152) is transmitted to the base station via the antenna (156), and transmitted to the destination server through a public network. After the transmission of the packet data ends, the main CPU (161) issues a request for disconnection to the communication controller (819).

On the other hand, if the call reception and negotiation do not proceed normally such that the transmission is impossible or unstable, the pickup images to be transmitted are stored once in a memory, and the untransmitted images stored in the memory are automatically retransmitted when the communication between the composite device (100) and the transmission destination server is established and stabilized.

Importantly, the composite device (100) of Ishiguro only provides for the transmission of image data captured by the image pickup unit (110) to a destination server. Accordingly, Ishiguro does not disclose an image storage control unit that controls the internal memory to store at least one of image identification with regard to the image data transferred to the

detachable portable memory and memory identification information to identify the detachable portable memory. Withdrawal of the rejection is respectfully requested.

Claims 8, 10, 21, 23 depend from independent claim 8, and claim 26 depends from independent claim 22 and thus, are allowable for at least the reasons discussed above as well as for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

**II. Rejections under 35 U.S.C. §103(a)**

Claims 9, 19 and 20 are rejected under 35 U.S.C. §103(a) over Ishiguro et al. This rejection is respectfully traversed.

The cancellation of claims 9 and 20 render the rejection of these claim moot.

Claim 20 depends from independent claim 15 and thus, is allowable for the reasons discussed above in addition to the features recited therein. Withdrawal of the rejection is respectfully requested.

Claim 11 is rejected under 35 U.S.C. §103(a) over Ishiguro in view of Niwa (U.S. Patent No. 6,538,692); claim 17 is rejected under 35 U.S.C. §103(a) over Ishiguro in view of Gaylord (U.S. Patent No. 6,773,953); claims 25 and 27 are rejected under 35 U.S.C. §103(a) over Ishiguro in view of Nanba (U.S. Patent No. 6,297,870). These rejections are respectfully traversed.

Niwa, Gaylord and Nanba fail to remedy the deficiencies of Ishiguro. Accordingly, since claims 11, 17, 25 and 27 depend from independent claims 8 and 22, these claims are also allowable for at least the reasons discussed above as well as for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

Claim 13 is rejected under 35 U.S.C. §103(a) over Nanba, Fukuoka (U.S. Patent No. 6,104,430) and in further view of Moronaga et al. (U.S. Patent No. 5,956,084). This rejection is respectfully traversed.

Fukuoka fails to disclose or suggest a connection unit that electrically, detachably, selectively and exclusively connects to a main body of the image-capturing device either a portable memory or a wireless communication circuit capable of wirelessly communicating with an external device and has a slot where either the portable memory or the wireless communication circuit is loaded.

Fukuoka discloses a camera (30) comprising a first card connector (17a) and a second card connector (17b) for receiving an I/O card (15) and a memory card (16), respectively. As shown in Figures 1 and 2 of Fukuoka two separate slots allow both the I/O card (15) and the memory card (16) to be attached to the camera simultaneously. In this respect, Fukuoka does not disclose that the card connector (17a) or the card connector (17b) can be used exclusively to connect either the portable memory or the wireless communication circuit to the camera (30). Thus, Fukuoka does not disclose or suggest features equivalent to those recited in independent claim 13. Accordingly, the Office Action's reliance on Fukuoka is improper. Therefore, the combination of Nanba, Fukuoka and Moronaga cannot render obvious the subject matter of independent claim 13. Withdrawal of the rejection is respectfully requested.

Claim 24 is rejected under 35 U.S.C. §103(a) over Ishiguro, Fukuoka and in further view of Nanba. This rejection is respectfully traversed.

As discussed above, Ishiguro fails to disclose all of the features recited in independent claim 8. Additionally, as discussed above, Fukuoka and Nanba fail to remedy the deficiencies of Ishiguro. Withdrawal of the rejection is respectfully requested.

### **III. New Claims**

New claims 28-30 depend from independent claim 8 and thus, are allowable for the reasons discussed above in addition to the features recited therein.

Regarding new claim 31, Applicants submit that the references cited fail to disclose or suggest the features recited in independent claim 31. More specifically, the references fail to

disclose or suggest a communication circuit that is capable of communicating with the external device by at least a first communication method and a second communication method, and that attempts the second communication method when communication with the external device is failed by the first communication method.

Regarding new claim 32, as discussed above, Applicants submit that Ishiguro fails to disclose an image-capturing device wherein "the image storage control unit controls the internal memory to store at least one of image identification information with regard to the image data transferred to the detachable portable memory and memory identification information to identify the detachable portable memory."

#### **IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



Mario A. Costantino  
Registration No. 33,565

Timothy S. Smith  
Registration No. 58,355

MAC:TSS/tbm

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**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

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